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	THE WAS
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address);	FOR COURT USE ONLY IS A
Oranic tár. As USOII	FOR COURT USE ONLY
SBN 94633	9.5 4.5 5 4.5
1671 The Alameda, Suite 300 San Jose, California 95126	
E-MAIL ADDRESS (Optional): (408) 293-8400 FAX NO. (Optional): (408) 293-0714	
ATTORNEY FOR (Name): Plaintiffs	A
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Santa Clara	
STREET ADDRESS. 191 North First Street	
MAJLING ADDRESS: San Jose, California 95113	
CITY AND ZIP CODE	
BRANCH NAME Downtown - Unlimited Jurisdiction	_ ^^=
PLAINTIFF: Lee Jackson and Kenneth Jackson	
200 Jackson and Reiniein Jackson	•
Clara City of Campbell United Authority, City of Santa	
Clara, City of Campbell, Humane Society Silicon	
DOES 1 TO 20 Valley	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death	.
AMENDED (Number):	1
Type (check all that apply):	
MOTOR VEHICLE OTHER (specify):	
Property Damage Wrongful Death	
Personal injury Other Damages (specify):	1
Jurisdiction (check all that apply):	CASE NUMBER:
ACTION IS A LIMITED CIVIL CASE	Thomas A.
Amount demanded does not exceed \$10,000	1 1 1 1 mm
exceeds \$10,000, but does not exceed \$26,000 ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)	1070 , U + 7 + 5c
ACTION IS RECLASSIFIED by this amended complaint	, , , , ,
from fimited to unlimited	1
from unlimited to limited	1
Plaintiff (name or names): Lee Jackson and Kenneth Jackson	
alleges causes of action against defendant (name of name): C:1:	
Santa Clara, City of Campbell, Humane Society Silicon This pleading including the American Society Silicon	Animal Control Authority, City o
2. This pleading, including attachments and exhibits, consists of the following number of page 5. Each plainfiff named above is a comment of the	Valley
. and branch trained above is a colliberal addit	^{185.} 13
a. except plaintiff (name): Silicon Valley Animal Control Authority	
(1) a corporation qualified to do business in California	5
(2) an unincorporated entity (describe):	
(3) a public entity (describe): Unknown type	
(4) a minor an adult	
(a) for whom a guardian or conservator of the estate or a guard	ian ad litem has been appointed
(") Land (apochy).	
(5) other (specify):	
b. except plaintiff (name): City of Santa Clara	
(1) a corporation qualified to do business in California	8
(2) an unincorporated entity (describe): (3) a public entity (describe): California City	
(3) a public entity (describe): California City (4) a minor an adult	
 (a) for whom a guardian or conservator of the estate or a guardian (b) other (specify): 	an ad litem has been appointed
(5) other (specify):	
1.1 Frank Annual Marie Control of the Control of th	
Information about additional plaintiffs who are not competent adults is shown in Attac	hmont 3
	Page 1 of 3
mm Approved for Optional Use COMPLAINT—Personal Injury, Property	Code of Civil Promoture, § 425, 12

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I	SHORT TITLE:	PLD-PI	-01
-	- Charles - March - Ma	CASE NUMBER:	
	Jackson v. Silcon Valley Animal Control Authority		
	4. Plaintiff (name):		-
	is doing business under the fictitious name (specify);	*	
	Spacify).		
	and has complied with the fictitious business name laws.		
5	Each defendant named above is a natural person		
	a. a except defendant (name): Silcon Valley Animal (1) a business organization, form unknown	- Campoci	
	(2) a corporation	(1) a business organization, form unknown (2) a corporation	
	(3) an unincorporated entity (describe):	(3) an unincorporated entity (describe):	
	(A) [7] (B) (C) (C)		
	(4) 📝 a public entity <i>(describe):</i> Form Unknown	(4) a public entity (describe):	
	(5) ather (specify):	City (5) other (specify):	
		(b) Collet (spacify).	
	b. except defendant (name): City of Santa Clara	4	
	(1) a business organization, form unknown	d. d. except defendant (name): Humane Society Silico	0
	(2) B corporation	(1) a business organization, form unknown (2) a corporation	
	(3) an unincorporated entity (describe):	(3) an unincorporated entity (describe):	
	(4) a public entity (describe):	(4) a public entity (describe):	
	City (5) other (specify):		
	(e) Callet (speakly).	(5) other (specify):	
	Information about additional defendants who are not natura	Name and a section to August	
6.			
u.	The true names of defendants sued as Does are unknown to plan. One defendants (specify Doe numbers): 1 to 10		
	named defendants and acted within the ecope of that	were the agents or employees of other agency or employment.	
	b. Doe defendants (specify Doe numbers): 11 to 20 plaintiff.	are persons whose capacities are unknown to	,
7.	Defendants who are joined under Code of Civil Procedure	section 382 are /namesi:	
		and the state of t	
8,	This court is the proper court because		
	a at least one defendant now resides in its jurisdictional	area.	
	b the principal place of business of a defendant corporati	ion or unincorporated association is in its jurisdictional area.	
	c. Injury to person or damage to personal property occur	ed in its jurisdictional area.	
	d other (specify):		
9.	Plaintiff is required to comply with a claims statute, and		
	a. has complied with applicable claims statutes, or		
	b. is excused from complying because (specify):		

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PLD-PI-001 SHORT TITLE: CASE NUMBER Jackson v. Silcon Valley Animal Control Authority 10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached): Motor Vehicle b. ✓ General Negligence Intentional Tort **Products Liability** Premises Liability Other (specify): **Exemplary Damages** 11. Plaintiff has suffered wage loss b. I loss of use of property c. / hospital and medical expenses d. general damage e. property damage loss of parning capacity g. other damage (specify): Other damage not known at this time The damages claimed for wrongful death and the relationships of plaintiff to the deceased are listed in Attachment 12. as follows: 13. The relief sought in this complaint is within the jurisdiction of this court. 14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for a. (1) compensatory damages (2) v punitive damages The amount of damages is (in cases for personal injury or wrongful death, you must check (1)): (1) secording to proof (2) in the amount of: \$ 15. The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers): Date: 1-29-07 Stuart M. Wilson (TYPE OR PRINT NAME) (SIGNATURE OF PLAINTIFF OR ATTURNEY)

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		PLD-PI-001(2
SHORT TITLE: Jackson v. Silicon Valley Animal Control Authority	CASE NUMBER:	
First CAUSE OF ACTION—General	Negligence	Page 4
ATTACHMENT TO Complaint Cross - Complaint		
(Use a separate cause of action form for each cause of action.)		
GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson		
alleges that defendant (name): Silicon Valley Animal Control Aut	hority and City of	Santa Clara
Does 1 to 20		
was the legal (proximate) cause of damages to plaintiff. By the following act negligently caused the damage to plaintiff on (date): December 19, 2005 at (place): Santa Clara, California	ts or omissions to act,	defendant
(description of mesons for liebility):		

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals.

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		PLD-PI-001(2)
SHORT TITLE: Jackson v. Silicon Valley Animal Control Authority	CASE NUMBER:	
	·	
Second (number) CAUSE OF ACTION—General	Negligence	Page 5
ATTACHMENT TO		1
(Use a separate cause of action form for each cause of action.)		
GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson		
allegee that defendant (name): City of Campbell		-
	150	* *
Does 1 to 20		
was the legal (proximate) cause of damages to plaintiff. By the following act negligently caused the damage to plaintiff on (date): December 22, 2005	s or omissions to act, i	defendant
at (place): Santa Clara, California	,	

(description of reasons for liability):

Defendant unlawfully conducted a post-seizure hearing in which Defendant found that the seizure of Plaintiff's property on 12-19-05 was lawful. Said finding was a denial of the due process rights of Plaintiffs and was an abuse of discretion violating Plaintiffs rights to a fair due process hearing.

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LOOF TIE		PLD-	PI-001(2
HORT TITLE: ackson v. Silicon Valley Animal Control Authority	CASE NUMBER:		
Third CAUSE OF ACTION—General	Negligence	Page	6
ATTACHMENT TO Complaint Cross - Complaint (Use a separate cause of action form for each cause of action.) GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson	u.	e de la	ř.
alleges that defendant (name): Silicon Valley Animal Control Aut	hority, City of San	ta Clara	
✓ Does 1 to 20			
was the legal (proximate) cause of damages to plaintiff. By the following act negligently caused the damage to plaintiff on (date): On or about 12-19-05 at (place): Santa Clara, California	s or amissions to act, c	defendant	

(description of reasons for liability):

Defendants negligently hired, trained and supervised employees including A. Morris, Al Davis, and others not known known by name who participated in the events surrounding the unlawful seizure of Plaintiffs' pet animals on 12-19-05.

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		PLD-PI-001(2
SHORT TITLE: Jackson v. Silicon Valley Animal Control Authority	CASE NUMBER:	<u> </u>
Jackson V. Sincon Valley Addinar Control Authority	6	
Fourth CAUSE OF ACTION—General	Negligence	Page 7
ATTACHMENT TO Complaint Cross - Complaint		e so
(Use a separate cause of action form for each cause of action.)		20 (0)
GN-1. Plaintiff (name): Lee Jackson and Kenneth Jackson		
alleges that defendant (name): Silicon Valley Animal Control Aut	hority and City of	Santa Clara
	*	
Does 1 to 20		
was the legal (proximate) cause of damages to plaintiff. By the following act negligently caused the demage to plaintiff on (date): On or about 12-19-05 at (place): Santa Clara, California	s or omissions to act, o	defendant

(description of reasons for liability):

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals thereby negligently inflicting severe emotional and mental suffering and distress upon the Plaintiffs.

	1991		PLI	D-PI-001(3)
SHORT TITLE: Jackson v. Silicon Valley Animal Con	trol Authority	CASE NUMBER		
Fifth CAUSE OF ACT	ION—Intentiona	l Tort	Page	8
ATTACHMENT TO Complaint Cross - Co	emplaint			
(Use a separate cause of action form for each cause of ac	ction.)		Tax on	
IT-1. Plaintiff (name): Lee Jackson and Kenneth Ja	ckson			
alleges that defendant (name): Silicon Valley Ar	imal Control Authorit	y and City of S	Santa Clara	
		*	-	
	. 2	:Z1		
[7] Page 1				

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally on (date)December 19, 2005

at (place)Santa Clara, California

(description of reasons for liability):

Defendant unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals. Said acts constitute assault and battery.

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SHORT TITLE:		PLD-PI-001(
Jackson v. Silicon Valley Animal Control Authority	CASE NUMBER	
Sixth CAUSE OF ACTION—Intentional	l Tort	Page 9
ATTACHMENT TO Complaint Cross - Complaint		20 (20)
(Use a separate cause of action form for each cause of action.)		
IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson		
alleges that defendant (name): Silicon Valley Animal Control Authorit	ty and City of	Santa Clara
✓ Does 1 to 20		420
was the legal (proximate) cause of damages to plaintiff. By the following acts of caused the damage to plaintiff on (date)December 19, 2005 at (place)Santa Clara, California	er omissions to act	t, defendant intentionally
(description of reasons for liability):		
Defendant unlawfully entered Plaintiffs' motorhome, unlawfully unlawfully detained Plaintiffs and assaulted and battered Plaintiff severed mental, emotional and physical harm and depriving them said acts Defendants intentional inflicted enverse and the said acts Defendants intentional inflicted enverse.	f Lee Jackson, of their prope	and the same

said acts Defendants intentional inflicted severe emotional and mental suffering and distress upon

Plaintiffs.

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	PLD-PI-001(
short חזנב: Jackson v. Silicon Valley Animal Control Authority	CASE NUMBER
Seventh CAUSE OF ACTION—Intention	al Tort Page 10
ATTACHMENT TO Complaint Cross - Complaint	
(Use a separate cause of action form for each cause of action.)	
IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson	
alleges that defendant (name): Silicon Valley Animal Control Author	ity and City of Santa Clara
\checkmark Does 1 to 20	
was the legal (proximate) cause of damages to plaintiff. By the following acts caused the damage to plaintiff on (date)December 19, 2005	or omissions to act, defendant intentionally
at (place)Santa Clara, California	*
(description of reasons for liability):	
Defendants unlawfully entered Plaintiffs' motorhome, unlawful unlawfully detained Plaintiffs and assaulted and battered Plainti	ly seized Plaintiffs pet animals, iff Lee Jackson, causing Plaintiffs

severed mental, emotional and physical harm and depriving them of their property, pet animals.

Plaintiffs were the lawful owners of said pet animals and were entitled to possession of the animals. By said acts Defendants unlawfully converted the pet animals to their use.

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		PLD-PI-001(3
HORT TITLE:	CASE NUMBER	
Jackson v. Silicon Valley Animal Control Authority		
Eighth CAUSE OF ACTION—Intentiona	l Tort Page	11
ATTACHMENT TO Complaint Cross - Complaint		24 (S)
(Use a separate cause of action form for each cause of action.)	¥	ş
IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson	<u>_</u>	
alleges that defendant (name): Silicon Valley Animal Control Authorit	y and City of Santa Cla	ага
	•	
Does 1 to 20	è	
was the legal (proximate) cause of damages to plaintiff. By the following acts of caused the damage to plaintiff on $(date)$ December 19, 2005	er omissions to act, defenda	nt intentionally

(description of reasons for liability):

at (plece)Santa Clara, California

Defendants unlawfully entered Plaintiffs' motorhome, unlawfully seized Plaintiffs pet animals, unlawfully detained Plaintiffs and assaulted and battered Plaintiff Lee Jackson, causing Plaintiffs severed mental, emotional and physical harm and depriving them of their property, pet animals. Such acts violated Plaintiffs' rights to be free of unreasonable searches and seizures under the Fourth and Fourteenth Amendments to the U.S. Constitution and is actionable under 42 U.S.C. section 1983.

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		PLD-PI-001(3)
SHORT TITLE:	CASE NUMBER	***************************************
fackson v. Silicon Valley Animal Control Authority		
Ninth CAUSE OF ACTION—Intention (number) ATTACHMENT TO Complaint Cross - Complaint	nal Tort Page _	12
(Use a separate cause of action form for each cause of action.) IT-1. Plaintiff (name): Lee Jackson and Kenneth Jackson alleges that defendant (name): Humane Society Silicon Valley		
was the logal (proximate) cause of damages to plaintiff. By the following accaused the damage to plaintiff on (date)December 19, 2005 at (place)Santa Clara, California (description of reasons for liability): Defendant took possession of the Plaintiffs' pet animals that he Animal Control Authority and converted them to their own us	ad been seized by the Silico	

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SHORT TITLE:		PLD-PI-001(6
Jackson v. Silicon Valley Animal Control Authority	CASE MUMBER:	
Exemplary Damages Atta	achment	Page 13
ATTACHMENT TO Complaint Cross - Complaint	,	Page B
EX-1. As additional damages against defendant (name): Silicon Valley Animal Control Authority and City of S	anta Clara	20.00
Plaintiff alleges defendant was guilty of malice fraud oppression		
as defined in Civil Code section 3294, and plaintiff should recover, in to make an example of and to punish defendant.	n addition to actual dama	ages, damages
EX-2. The facts supporting plaintiff's claim are as follows;		
Defendants unlawfully entered Plaintiffs' motorhome, un unlawfully detained Plaintiffs and assaulted and battered severed mental, emotional and physical harm and depriv	Plaintiff I an Ingles	

EX-3. The amount of exemplary damages sought is

a.	1	not shown, pursuant to Code of Civil Procedure section 425.10

b. ____ \$

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